

**UNITED STATES DISTRICT COURT**  
**MIDDLE DISTRICT OF TENNESSEE**  
**AT NASHVILLE**

LEXINGTON INSURANCE COMPANY; ) Case No. 3:13-cv-1054  
NATIONAL UNION FIRE INSURANCE )  
COMPANY OF PITTSBURGH, ) JUDGE TRAUGER  
PENNSYLVANIA; GREAT LAKES )  
REINSURANCE (UK) PLC; ACE ) MAGISTRATE JUDGE KNOWLES  
AMERICAN INSURANCE COMPANY; )  
XL INSURANCE AMERICA, INC.; )  
IRONSHORE SPECIALTY INSURANCE )  
COMPANY; TALBOT SYNDICATE 1183; )  
TORUS SPECIALTY INSURANCE )  
COMPANY; NAVIGATORS SYNDICATE )  
1221 (f/k/a MILLENNIUM SYNDICATE )  
1221); PEMBROKE SYNDICATE 4000; )  
SJC 2003/CATLIN; BRIT INSURANCE, )  
SYNDICATE 2987; CHAUCER MARINE, )  
SYNDICATE 1084; BERKSHIRE )  
HATHAWAY INTERNATIONAL )  
INSURANCE; ARCH INSURANCE )  
COMPANY AND LANDMARK )  
AMERICAN INSURANCE COMPANY, )  
)  
Plaintiffs, )  
)  
v. )  
LION OIL COMPANY, )  
)  
)  
Defendant. )

**STIPULATED MOTION TO CHANGE THE TIME OF**

**DECEMBER 2, 2013 INITIAL CASE MANAGEMENT CONFERENCE**

The Parties respectfully move the Court to reschedule the Initial Case Management Conference set for December 2, 2013 from 1:30 pm to 3:30 pm. Out of state counsel requests the accommodation to allow avoiding travel on Sunday of Thanksgiving weekend. Alternatively, the Parties request that the Case Management Conference be scheduled for anytime on December 3, 2013.

Respectfully submitted,

ROBINS, KAPLAN, MILLER & CIRESI L.L.P.

By: /s/ William A. Webster  
William A. Webster, (Admitted *Pro Hac Vice*)  
[WAWebster@rkmc.com](mailto:WAWebster@rkmc.com)  
Amy M. Churan, (Admitted *Pro Hac Vice*)  
[AMChuran@rkmc.com](mailto:AMChuran@rkmc.com)  
Glenanne B. Kennedy, (Admitted *Pro Hac Vice*)  
[GBKennedy@rkmc.com](mailto:GBKennedy@rkmc.com)  
2049 Century Park East, 34<sup>th</sup> Floor  
Los Angeles, CA 90067-3208  
Telephone: (310) 552-0130  
Facsimile: (310) 229-5800

Attorneys for Plaintiffs, Lexington Insurance Company; National Union Fire Insurance Company of Pittsburgh, Pennsylvania; Great Lakes Reinsurance (UK) PLC; ACE American Insurance Company; XL Insurance America, Inc.; Ironshore Specialty Insurance Company; Talbot Syndicate 1183; Torus Specialty Insurance Company; Navigators Syndicate 1221 (f/k/a Millennium Syndicate 1221); Pembroke Syndicate 4000; SJC 2003/Catlin; Brit Insurance, Syndicate 2987; Chaucer Marine, Syndicate 1084; Berkshire Hathaway International Insurance; Arch Insurance Company; and Landmark American Insurance Company;

BRADLEY ARANT BOULT CUMINGS LLP

By: /s/ Harold Frederick Humbracht, Jr.  
Harold Frederick Humbracht, Jr., (Bar No. 2993)  
[rhumbracht@babc.com](mailto:rhumbracht@babc.com)  
1600 Division Street, Suite 700  
Nashville, TN 37203-0025  
Telephone: (615) 244-2582  
Facsimile: (615) 252-6380

Attorneys for Defendant, Lion Oil Company

**CERTIFICATE OF SERVICE**

I, WILLIAM A. WEBSTER, hereby certify that on this 18th day of November 2013, a copy of the foregoing **STIPULATED MOTION TO CHANGE THE TIME OF DECEMBER 2, 2013 INITIAL CASE MANAGEMENT CONFERENCE** was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to the following counsel of record:

**Geoffrey J. Greeves**

**Vernon C. Thompson, Jr.**

**Vincent E. Morgan**

**Peter M. Gillon**

Pillsbury, Winthrop, Shaw & Pittman, LLP

2300 N Street, NW

Washington, DC 20037-1122

E-mail: [geoffrey.greeves@pillsburylaw.com](mailto:geoffrey.greeves@pillsburylaw.com)

[vernon.thompson@pillsburylaw.com](mailto:vernon.thompson@pillsburylaw.com)

[vince.morgan@pillsburylaw.com](mailto:vince.morgan@pillsburylaw.com)

[peter.gillon@pillsburylaw.com](mailto:peter.gillon@pillsburylaw.com)

**Harold Frederick Humbracht, Jr.**

Bradley Arant Boult Cummings LLP (Nashville)

1600 Division Street, Suite 700

Nashville, TN 37203-0025

E-mail: [rhumbracht@babc.com](mailto:rhumbracht@babc.com)

Dated: November 18, 2013

/s/ William A. Webster

WILLIAM A. WEBSTER